

MEMO ENDORSED

LATHAM & WATKINS LLP

August 12, 2020

The Honorable Katherine Polk Failla
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, New York 10007

53rd at Third
 885 Third Avenue
 New York, New York 10022-4834
 Tel: +1.212.906.1200 Fax: +1.212.751.4864
 www.lw.com

FIRM / AFFILIATE OFFICES

Beijing	Moscow
Boston	Munich
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

Re: *Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank, et al.*, 1:19-cv-10023

Dear Judge Failla:

On July 3, 2020, Defendants in the above-captioned matter requested the temporary sealing of a single document (filed multiple times) due to the inadvertent disclosure of information contained therein. *See* ECF Nos. 112, 113, 114, 115, 116, 121, 122. Defendants now respectfully request that the Court (i) order the ECF Clerk to permanently seal the unredacted versions of this document filed at ECF Nos. 112, 113, 114, 115, 116, 121, and 122, and (ii) accept and deem filed the identical version of that document with minimal redactions applied, attached as Exhibit 1. The reasons for this request are set forth in Defendants' *in camera* submissions to the Court, expressly incorporated by reference herein, which have already been accepted by the Court in its July 30, 2020 Order. ECF. No. 207.

Respectfully Submitted,

/s/ Christopher J. Clark
 Christopher J. Clark
 of LATHAM & WATKINS LLP

Encl.

cc: All Counsel of Record via ECF
 Application GRANTED. The Clerk of Court is directed to place docket entries 112, 113, 114, 115, 116, 121, and 122 under permanent seal, visible to the Court and parties only.

SO ORDERED.

Dated: August 13, 2020
 New York, New York

Katherine Polk Failla

HON. KATHERINE POLK FAILLA
 UNITED STATES DISTRICT JUDGE